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FILED.

DATED: 3:52 pm, April 27, 2022

U.S. MAGISTRATE JUDGE

7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

CRIMINAL COMPLAINT

9 Plaintiff,

Case No.: 2:22-mj-00321-DJA

10 vs.

Violations:

11 CHRISTOPHER S. HOUSLEY,

21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(C)
– Conspiracy to Distribute a Controlled
Substance - Tapentadol

13 Defendant.

14 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
15 Complainant, being duly sworn, deposes and states:

16 **COUNT ONE**

(Conspiracy to Distribute a Controlled Substance)

17 Beginning on or about July 2020, and continuing up to and including April 26,
18 2022, in the State and Federal District of Nevada,

19 **CHRISTOPHER S. HOUSLEY,**

20 defendant herein, knowingly and intentionally combined, conspired, confederated, and agreed
21 with other persons to distribute Tapentadol, a Schedule II controlled substance, in violation of
22 Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(C).
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1. Your Complainant is a TFO federally deputized with the DEA in the Las Vegas District Office, Nevada and have been so assigned since January 2020. Your Complainant has been employed by the Nevada Highway Patrol (NHP) since September 2011 and assigned as a narcotics investigator since February 2015. Your Complainant is currently assigned to the Tactical Diversion Squad at the DEA and am responsible for enforcing the controlled substances laws and regulations of the United States. Your Complainant has acquired knowledge and experience as to enforcing the Controlled Substance Act. Your Complainant has participated in a variety of different aspects of those investigations, including surveillance, undercover operations, controlled purchases of controlled substances, and the execution of search and arrest warrants.

2. Based on her training and experience, your Complainant has become familiar with the methods used by drug traffickers and drug trafficking organizations to conduct various criminal activities. The aforementioned methods include, but are not limited to, the following: drug manufacturing, distribution, money laundering, and firearms offenses. Your Complainant has also become familiar with the methods used by such individuals to avoid detection by law enforcement, to include: multiple cellular telephones (including those that are subscribed in the names of other persons), prepaid cellular telephones, counter-surveillance techniques, coded and ambiguous language, usage of multiple vehicles, and false identities

3. During her employment as a law enforcement officer, your Complainant received training in connection with, and conducted investigations of violations of Title 21 U.S.C. Sections 841 and 846, and others.

4. The facts in this complaint come from your Complainant's personal observations, training and experience, and information obtained from other agents and witnesses. The following information contained within this criminal complaint is based upon my participation in this

1 investigation or was provided to me by other law enforcement personnel. This complaint is
2 intended to show merely that there is sufficient probable cause for the requested complaint and
3 does not set forth all of your Complainant's knowledge about this matter. All times noted are
4 approximate.

5 **FACTS ESTABLISHING PROBABLE CAUSE**

6 5. In July 2020, investigators from the DEA Las Vegas District Office (LVDO)
7 Tactical Diversion Squad (TDS) received information from an internal law enforcement source
8 regarding Christopher HOUSLEY (HOUSLEY). The information indicated that HOUSLEY and
9 another individual ordered an industrial sized pill press and were potentially manufacturing and
10 distributing narcotics in Las Vegas. According to Nevada State Treasury corporate records,
11 HOUSLEY is a co-owner of Next Century Health LLC, the business that ordered the large
12 industrial sized pill press. FedEx Freight was to deliver the industrial sized pill press to another
13 individual's residence on July 15, 2020.

14 6. On September 2, 2020, TDS investigators served an administrative subpoena to
15 Federal Express, requesting specific shipment information related to HOUSLEY's address. The
16 returned information confirmed shipments to HOUSLEY's known residence and also indicated
17 another address associated with HOUSLEY: a PO Box located in Las Vegas leased to a "Robert
18 WHITE" (WHITE). The PO Box for WHITE, located at a UPS store in Las Vegas, Nevada, had
19 received a shipment from a company that law enforcement intelligence has previously linked to
20 seizures of illegal narcotics.

21 7. On September 17, 2020, TDS investigators subpoenaed information from the UPS
22 Store that contains the PO Box registered to WHITE. UPS Store Records revealed that
23 HOUSLEY was using WHITE as an alias to rent the PO Box. TDS investigators positively
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1 identified HOUSLEY as WHITE through investigative means and video surveillance using that
2 specific PO Box location.

3 8. In January of 2021, TDS investigators were contacted by CBP/HSI who advised
4 that they interdicted and seized seventeen inbound parcels at JFK International Airport in New
5 York. All seventeen inbound parcels were destined for addresses belonging to
6 HOUSLEY/WHITE. These seventeen seized parcels originated from India, and contained a
7 combination of the following substances – Carisoprodol (a schedule IV controlled substance),
8 Tadalafil (a schedule II controlled substance), and Sildenafil. The total approximate weight for the
9 pills interdicted during this time was 11,774 gross grams.

10 9. In June 2021, a Waukesha, Wisconsin City Police Detective contacted TDS
11 investigators. The detective relayed information that the Waukesha City Police found a deceased
12 individual, herein referred to as “J.K.,” inside his apartment on May 27, 2021. Several blister
13 packs of pills containing Aspadol Tabs¹ and Carisoprodol Tabs were located in close proximity to
14 J.K.. One of the packs of Aspadol Tabs were still bubble wrapped and found in or near a USPS
15 box post marked May 20, 2021, with a sender’s name of Robert WHITE (an alias known to be
16 used by HOUSLEY). TDS investigators confirmed in July 2021, that the PO Box was still being
17 used by HOUSLEY through UPS store records. On May 28, 2021, the Waukesha County Medical
18 Examiner’s Office conducted an autopsy on J.K. Subsequent to the autopsy and toxicology, the
19 Waukesha County Medical Examiner determined that J.K.’s cause of death was from Tapentadol
20 intoxication, and listed ‘other significant conditions’ as Carisoprodol, Clonazepam, Etizolam,
21 Ethanol and Gabapentin use. Based on a partial analysis of J.K.’s phone, J.K. ordered the blister

23 24 1 Tapentadol is the active pharmaceutical ingredient in Aspadol Tabs, which have not been
approved by FDA for use or distribution in the United States. Tapentadol is a Schedule II
controlled substance.

1 packs of pills found near his body from buytapentadol.com. Additionally, TDS investigators
2 confirmed that the packaging of the pills delivered to J.K. was consistent in appearance with the
3 packaging of the pills seized by CBP destined for HOUSLEY, and consistent with undercover
4 (UC) purchases from buytapentadol.com.

5 10. On August 4, 2021, TDS investigators received a response from XPS Ship, a parcel
6 shipping company, for subpoenaed account information associated to Next Century Health, LLC,
7 HOUSLEY. Shipping records identified an account corresponding to the customer name Next
8 Century Health, with a contact name of Chris HOUSLEY. The information registered with the
9 shipping records identified HOUSLEY's residence, as well as his phone number and email known
10 to your Complainant. This account was activated on August 7, 2020 and shipment records
11 indicated 4,729 packages were sent between May and July 2021.

12 11. On August 18, 2021, TDS investigators made a UC purchase of 200 suspected
13 Tapentadol tablets from BUYTAPENTADOL.com, a website that TDS investigators believe to be
14 associated with HOUSLEY. On August 20, 2021, USPS delivered the package containing the
15 suspected Tapentadol tablets to a UC mailbox. A United States Postal Inspector (USPI) retrieved
16 the package and transferred custody of it to TDS investigators. The return address listed on the
17 package was Robert White, which, as previously stated in this affidavit, is a known alias and
18 address used by HOUSLEY.

19 12. During the month of September 2021, TDS investigators took custody of numerous
20 parcels that had been seized by CBP/HSI at JFK International Airport in New York and that were
21 all destined for addresses belonging to HOUSLEY/WHITE. These seized parcels originated from
22 India and contained suspected Tapentadol and Sildenafil. The total approximate weight of the
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1 suspected Tapentadol was 78,733 gross grams and the total approximate weight of the Sildenafil
2 was 29,091 gross grams.

3 13. On October 25, 2021, TDS investigators made another UC purchase of 200
4 suspected Tapentadol tablets from buytapentadol.com. The following day, TDS investigators and
5 your Complainant conducted physical surveillance of HOUSLEY starting at his residence. At one
6 point, HOUSLEY left his residence and drove directly to the United States Post Office located at
7 455 E Pebble Rd, Las Vegas, Nevada. Once there, HOUSLEY entered the facility carrying a trash
8 bag full of packages that he dropped off to be shipped then left immediately after. After
9 HOUSLEY departed the post office, TDS investigators confirmed that HOUSLEY dropped off a
10 large number (more than 20) USPS parcels to be mailed. Your Complainant observed these
11 packages, and took photographs of them. All the packages HOUSLEY dropped off at the post
12 office had the same return address of Robert WHITE on the shipping label. Furthermore, within
13 the group of outbound parcels, your Complainant located the package addressed to the UC from
14 the buytapentadol.com purchase. On October 27, 2021, this same package containing the
15 suspected Tapentadol tablets was delivered to this UC mailbox/address. A United States Postal
16 Services investigator retrieved the package and transferred custody of it to TDS investigators.

17 14. On October 14, 2021, TDS investigators obtained a search warrant authorizing the
18 search and seizure of information associated with a Hotmail.com email address believed to be
19 used by HOUSLEY.

20 15. Subsequent to the authorization of the search warrant for HOUSLEY's email, TDS
21 investigators analyzed the data from HOUSLEY's email account. HOUSLEY's email contained a
22 saved Excel spreadsheet containing comprehensive data listing order numbers, order date,
23 username, product name, product quantity, shipping address, shipping cost and commission. All
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1 of this information appeared to pertain to controlled substance purchases suspected to correlate
2 with the website buytapentadol.com. Included in this spreadsheets' data was all the information
3 pertaining to the shipment of Tapentadol and Carisoprodol to the J.K. (deceased), in Wisconsin.

4 16. On November 5, 2021, TDS investigators took custody of another shipment of
5 numerous parcels that had been seized by CBP/HSI at JFK International Airport in New York
6 during the month of October 2021 and that were all destined for addresses belonging to
7 HOUSLEY/WHITE. These seized parcels originated from India and contained suspected
8 Tapentadol. The total approximate weight of the suspected Tapentadol was approximately 15,632
9 gross grams.

10 17. On November 18, 2021, TDS investigators obtained a search warrant authorizing
11 the search and seizure of information and data associated with TextNow, Inc. account used by
12 Christopher HOUSLEY.

13 18. Subsequent to the authorization of the search warrant for HOUSLEY's Text Now
14 Inc. application, TDS investigators analyzed the data from HOUSLEY's account.

15 19. The information from the Text Now, Inc. application revealed that HOUSLEY sent
16 pricelists of the narcotics he had available for sale to his customers as recently as November 2021.
17 This pricelist contained prices for numerous controlled substances including, but not limited to:
18 "Tapentadol", "Alprazolam", "Adderall", and "MDMA".

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20. Based on the facts set forth in this affidavit, your Complainant believes there is probable cause that HOUSLEY did violate Title 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 846 and Title 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

Respectfully submitted,

Amber Sandoval, Task Force Officer
Drug Enforcement Administration

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on April 27 2022.

HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

